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MARY L. M. MORAN
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8 *Attorneys for Applicant for Intervention*

9 *Charmaine R. Torres*

10 **DISTRICT COURT OF GUAM**

11 **TERRITORY OF GUAM**

12 **JULIE BABAUTA SANTOS, individually,**
13 **and on behalf of all those similarly situated,**

14 **Petitioner,**

15 **-vs-**

16 **FELIX P. CAMACHO, Governor of Guam;**
17 **ART ILAGAN, Director of Department of**
18 **Revenue and Taxation; LOURDES M.**
19 **PEREZ, Director of Department of**
20 **Administration; and GOVERNMENT OF**
21 **GUAM,**

22 **Respondents.**

23 **CHARMAINE R. TORRES, on behalf of**
24 **herself and all others similarly situated,**

25 **Applicant for Intervention.**

CIVIL CASE NO. CV04-00006

DECLARATION OF PETER C. PEREZ

ORIGINAL

1 I, Peter C. Perez, declare as follows:

2 1. I submit this declaration in response to Petitioner Santos's Opposition and Amended
3 Opposition to Applicants for Intervention Naputi and Torres' Motion to Intervene.

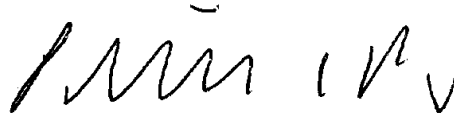
4 2. I am a member of the law firm of Lujan, Aguigui & Perez LLP. Lujan Aguigui &
5 Perez LLP was formed on or about January 1, 2003. The founding partners of the firm are David
6 J. Lujan, Ignacio C. Aguigui, and myself. Lujan Aguigui & Perez LLP is counsel for Applicant
7 for Intervention, Charmaine R. Torres, in this action.
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9 3. The firm, through me represented Lourdes M. Perez in SP0084-04 and CRQ04-01.
10 SP0084-04 *Kaleo S. Moylan, I Segundu Na Maga'Lahen Guahan, and the Office of I Segundu Na*
11 *Maga'Lahen Guahan v. Felix P. Camacho, I Maga'Lahen Guahan, and Lourdes M. Perez,*
12 *Director of Administration*, concerned applications by the Lieutenant Governor of Guam for
13 alternative and peremptory writs of mandate compelling Respondents to take certain actions
14 relating to the Guam State Clearinghouse law, P.L. 26-169, and to void the terminations of two of
15 Petitioner's employees. CRQ04-01 *In Re: Request of Governor Felix P. Camacho Relative to the*
16 *Interpretation and Application of §§ 6 and 9 of the Organic Act of Guam*, concerned the
17 Governor of Guam's Request for a Declaratory Judgment relative to the interpretation and
18 application of §§ 6 and 9 of the Organic Act of Guam.
19

20 4. Petitioner Santos suggests that the firm has a conflict of interest because of its
21 representation of Ms. Perez in the foregoing matters. However, this allegation is untrue. No
22 conflict exists. The cases are in no way related to the instant action, which involves entitlement
23 of Guam taxpayers to the Earned Income Tax Credit ("EIC"). Moreover, the firm terminated its
24 representation of Ms. Perez before it filed the Motion to Intervene on behalf of Charmaine R.
25 Torres on July 6, 2004.
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1 I declare under penalty of perjury under the laws of Guam that the foregoing is true to the
2 best of my knowledge and belief.

3 Executed this 2nd day of August, 2004, in Hagåtña, Guam.

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6 PETER C. PEREZ
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